



**Winston H. Hickox**  
*Secretary for  
Environmental  
Protection*

# California Regional Water Quality Control Board

## Los Angeles Region

320 W. 4th Street, Suite 200, Los Angeles, California 90013  
Phone (213) 576-6600 FAX (213) 576-6640  
Internet Address: <http://www.swrcb.ca.gov/~rwqcb4>



**Gray Davis**  
*Governor*

March 10, 2000

Mr. Terry D. Avchen  
Christensen, Miller, Fink, Glaser, Weil & Shapiro, LLP  
2121 Avenue of the Stars  
18<sup>th</sup> Floor  
Los Angeles, CA 90067-5010

CLEANUP & ABATEMENT ORDER NO. 99-118 FOR HUFFY CORPORATION,  
FORMERLY LOCATED AT 1120 W. FOOTHILL BLVD., AZUSA., CA (FILE NO. 108.  
1697)

Dear Mr. Avchen:

This is in reference to a work plan titled, "Work plan for the Investigation of the Unsaturated Zone at the Former Huffy Facility for Perchlorate, 1,4-dioxane and NDMA" for the subject site. The report was dated February 14, 2000 and transmitted by Dudek & Associates, Inc. on Huffy's behalf.

In the work plan, you are proposing to take soil matrix samples from the following seven locations: The western, eastern, and southern drum storage areas, the paint spray booth, the paint stripping area, the manufacturing area and the clarifier areas. The proposed samples will be collected from trenches at depths of approximately 3 feet below ground surface (bgs). Soil samples will be collected from the backhoe bucket using a trowel. Dedicated trowels will be used for each sample location.

We concur with the proposed sampling locations, however, samples should be collected below structures, such as clarifiers, that may have leaked. In addition, the proposed sampling depths may not be sufficient. At least one facility has proposed to take deeper soil samples by drilling using mud rotary drilling. We strongly recommend that Huffy consider to take deeper soil samples in addition to the proposed shallow soil samples.

In order to discuss the standardization of issues such as: 1) media to be sampled for emergent chemicals; 2) sampling depths and number of samples; 3) analytical methods; 4) detection limits and their validation; 5) finding experienced laboratories, we are proposing a meeting at the Regional Board of all required parties and other interested parties. The proposed meeting date and time are March 30, 2000 at 10:00 a.m. Please try to attend this meeting, or send a representative.

***California Environmental Protection Agency***



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Addressee

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Date

If you have any questions concerning this matter, please call me at (213) 576-6727.

Sincerely,

  
Ejigu Solomon

Associate Engineering Geologist

cc: Wayne Praskins, USEPA, Region IX  
Dr. Jackie Spizman, Cal-EPA, DTSC  
Peter Quinlan, Dudek & Associates

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